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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE: October 18, 2005

SUBJECT: Comments on Draft FS and RI Report
for Chemical
Recovery Systems, Elyria, Lorain
County, Ohio, Cerclis No.
OHD057001810, Revision 1, July 2005

FROM: Andrew Podowski, Toxicologist
Remedial Response Section #5

TO: Gwendolyn Massenburg, RPM

Basically, I agree with Metcalf & Eddy's
comments of September 30, 2005.

In addition, I just have a couple of other
comments.

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Since risk evaluation was conducted for
commercial/industrial receptors, with only a
hypothetical resident scenario evaluated for
informational purposes it is, therefore,
necessary that a deed restriction be
placed/created for this site restricting future
use to be commercial/industrial. This is so
because future zoning may change and the Agency
(U.S. EPA) must, therefore, be assured that any
changes to zoning in the future alert zoning
officials of potential risks to residents. This
would require further and more extensive re-
evaluation of residential scenarios than what
is provided in this document. ~~X~~

It is stated that 'groundwater ingestion pathway
is incomplete at the site because municipal
water is provided to the siteand impacted
groundwater is not and is unlikely to be used
as a drinking water source'.

Just to make sure that impacted groundwater is
not going to be used as a future drinking water
source, the deed restriction mentioned above
should address this issue as well by
specifically stating that future groundwater
use is prohibited by future users of the site
pending determination of potential exposure and
risk under different use scenarios.

Furthermore, a realistic (not hypothetical)
scenario that requires evaluation of potential
groundwater exposures can be based on the

likelihood of contaminated groundwater charging the nearby river. Then, evaluation of surface water ingestion, dermal contact and inhalation exposures determined for current and future (using modeling) exposures for recreational fisherman fishing in the nearby river. Incidental, by virtue of being accidental, ingestion and dermal contact of contaminated groundwater should be evaluated for current and future recreational fisherman, and this should also include the possible ingestion of contaminated fish.

I hope this information is useful to you. If you have any further questions, please call me at 6-7573.